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CIRCUIT CITY STORES, INC. LIQUIDATING TRUST

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL) ANTITRUST
LITIGATION

CASE NO. 3:10-CV-5625-SI

MDL NO. 3:07-MD-1827-SI

THIS DOCUMENT RELATES TO:

3:10-CV-5625-SI

**STIPULATION OF EXTENSION OF TIME
TO RESPOND TO COMPLAINT, WAIVER
OF SERVICE, AND [PROPOSED] ORDER**

ALFRED H. SIEGEL, AS TRUSTEE OF THE
CIRCUIT CITY STORES, INC. LIQUIDATING
TRUST,

Date Action Filed: December 10, 2010

Plaintiff,

vs.

AU OPTRONICS CORPORATION, et al.,

Defendants.

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MASTER FILE NO. 3:07-MD-1827 SI

CASE NO. 3:10-CV-5625 SI

STIPULATION OF EXTENSION OF TIME TO RESPOND TO COMPLAINT, WAIVER OF SERVICE, AND
[PROPOSED] ORDER

WHEREAS plaintiff Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust, on behalf of Circuit City Stores, Inc. and its affiliated companies ("Circuit City Trust"), filed a complaint in the above-captioned case against defendants AU Optronics Corporation, AU Optronics Corporation America, Chi Mei Corporation, Chi Mei Optoelectronics Corporation, Chi Mei Optoelectronics USA, Inc., CMO Japan Co. Ltd., Nexgen Mediatech, Inc., Nexgen Mediatech USA, Inc., Epson Imaging Devices Corporation, Epson Electronics America, Inc., HannStar Display Corporation, LG Display Co. Ltd., LG Display America, Inc., Samsung Electronics Co., Ltd., Samsung Semiconductor, Inc., Samsung Electronics America, Inc., Sharp Corporation, Sharp Electronics Corporation, Toshiba Corporation, Toshiba America Electronic Components, Inc., Toshiba Mobile Display Co., Ltd., Toshiba America Information Systems, Inc., Hitachi, Ltd., Hitachi Displays, Ltd., and Hitachi Electronic Devices (USA), Inc. (collectively "Stipulating Defendants"), and other defendants, on December 10, 2010 ("Complaint");

WHEREAS Circuit City Trust wishes to avoid the burden and expense of serving process on the Stipulating Defendants;

WHEREAS the Stipulating Defendants desire a reasonable amount of time to respond to the Complaint; and

WHEREAS Circuit City Trust and the Stipulating Defendants believe that proceeding on a unified response date will create efficiency for the Court and the parties;

THEREFORE, Circuit City Trust and the Stipulating Defendants hereby agree:

1. The Stipulating Defendants waive service of the Complaint under Federal Rule of Civil Procedure 4(d). This stipulation does not constitute a waiver by the Stipulating Defendants of any other substantive or procedural defense, including but not limited to the defenses of lack of personal or subject matter jurisdiction and improper venue.

2. The Stipulating Defendants' deadline to move to dismiss, answer, or otherwise respond to the Complaint will be 90 days from the execution of this stipulation.

1 DATED: February 2, 2011

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Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the filing of this document has been obtained from the signatories to this document.

PURSUANT STIPULATION, IT IS SO ORDERED.

By: 

Judge of the U.S. District Court, N.D. California

2/4/11

Date: _____